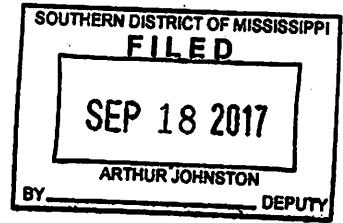


IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION



DOUGLAS HANDSHOE

PLAINTIFF

VS.

CIVIL ACTION NO. 1:15cv382HSO-JCG

VAUGHN PERRET, CHARLES LEARY &  
DANIEL ABEL, D/B/A TROUT  
POINT LODGE LTD OFNOVA SCOTIA  
& IN THEIR INDIVIDUAL CAPACITIES  
PROGRESS MEDIA GROUP LIMITED,  
MARILYN SMULDERS, TORSTAR  
CORPORATION, NATIONAL  
GEOGRAPHIC SOCIETY, XYZ  
FOUNDATION & JOHN DOES 1-50

DEFENDANTS

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**DEFENDANTS VAUGHN PERRET AND CHARLES LEARY'S  
MOTION FOR JUDICIAL NOTICE AND TO LIMIT VALUE OF PLAINTIFF'S  
ACTION BASED ON FRESH ADMISSION, WAIVER**

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COME NOW Defendants Vaughn Perret and Charles Leary, appearing *pro se*, and file this their Motion for Judicial Notice and to Limit Value of Plaintiff's Action based on Fresh Admission and Waiver, and would show that the Plaintiff has filed with Mississippi state court documents admitting that this action is worth a fraction of \$10,000 and not for over \$180,000 as stated in the Third Amended Complaint, and for the reasons discussed in their memorandum brief in support of this motion, which is filed contemporaneously herewith. Plaintiff has misrepresented the value of his claim to this Court and to the Defendants, who relied on his representations in critical decision making regarding this case, which has dragged on far too long.

Defendants Leary and Perret respectfully move this Court to find Plaintiff has either waived or must be estopped from claiming more than a fraction of \$10,000, and for such general relief as the Court deems appropriate in the premises.

RESPECTFULLY SUBMITTED, this the 14<sup>th</sup> day of September, 2017.

 VAUGHN PERRET, DEFENDANT and  
CHARLES LEARY, DEFENDANT  
Charles Leary  
appearing *pro se*

140 Trout Point Road  
E. Kemptville, NS B5A 5X9 Canada  
(902) 761-2080  
foodvacation@gmail.com